

# MEMORANDUM ENDORSED



HON. SYLVIA O. HINDS-RADIX  
*Corporation Counsel*

**THE CITY OF NEW YORK  
LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

MARTHA NIMMER  
*Special Assistant Corporation Counsel*  
Cell: (917) 499-8632

July 6, 2023

**VIA ECF**

Hon. Gregory H. Woods  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007

Re: *A.D. v. N.Y.C. Dep't of Education*, 23-cv-2376 (GHW)(JW)

Dear Judge Woods:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, the Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act ("IDEA"), 20 U.S.C. §1400, *et seq.*, as well as for this action.

I write to respectfully request i) a 6-week extension of Defendant's time to answer, from July 11, 2023 to August 22, 2023, and ii) a 6-week extension of the joint status letter deadline, from August 8, 2023 to September 19, 2023. Plaintiff consents to these requests. This is the second request for an extension of the answer deadline and the first request for an extension of the joint status letter deadline. The first request to extend the answer deadline was made on April 4, 2023 and granted by Your Honor that same day. The requested extension will allow the parties to continue discussing settlement, now that Defendant has made an initial offer. The parties are hopeful that they will settle this matter without further burden on the Court's time.

Accordingly, Defendant respectfully requests that its time to respond to the complaint be extended to August 22, 2023, and that the joint status letter deadline be extended to September 19, 2023.

Thank you for considering these requests.

Respectfully submitted,

/s/

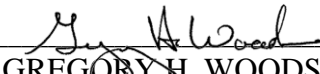
Martha Nimmer, Esq.  
Special Assistant Corporation Counsel

cc: Kevin Mendillo, Esq. (via ECF)

Defendant's application for an extension of time to answer or otherwise respond to the complaint, Dkt. No. 1, is granted. The deadline for Defendant to answer or otherwise respond to the complaint is extended to August 22, 2023. The parties are directed to submit a status letter informing the Court of settlement or proposing a briefing schedule no later than September 19, 2023. The Clerk of Court is respectfully directed to terminate the motion pending at Dkt. No. 8.

SO ORDERED.

Dated: July 6, 2023  
New York, New York

  
GREGORY H. WOODS  
United States District Judge